## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

Chapter 11

Case No. 22-90273 (MI)

HOLDINGS, INC. (f/k/a Compute North

Holdings, Inc.), et al.,

(Jointly Administered)

PLAN ADMINISTRATOR'S WITNESS AND EXHIBIT LIST FOR HEARING ON DEBTORS' OBJECTION TO CLAIM NO. 14 OF BOBS LIMITED SCHEDULED FOR SEPTEMBER 11, 2023 AT 1:30 P.M. (PREVAILING CENTRAL TIME)

Debtors.<sup>1</sup>

Tribolet Advisors LLC, as Plan Administrator (the "<u>Plan Administrator</u>") in the above-captioned bankruptcy cases and proponent of the *Debtors' Objection to Claim No. 14 of Bobs Limited* [Docket No. 850], hereby files this Witness and Exhibit List for the hearing taking place on September 11, 2023 at 1:30 p.m. (prevailing Central Time).

The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Reorganized Debtors' service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

### **WITNESSES** (may call):

1. Michael Tribolet, Managing Member of Tribolet Advisors LLC as Plan Administrator

Judge: Marvin Isgur Courtroom 404

2. Peter Allard, CEO of True North Data Solutions (U.S.), Inc.

Hearing Date: September 11, 2023

3. Representative of Bobs Limited

4. Any rebuttal and/or impeachment witnesses; and

Hearing Time: 1:30 p.m.

5. All persons listed on the witness list of any party.

<u>Party's Name:</u> Tribolet Advisors LLC as Plan Administrator in the Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) bankruptcy cases

Attorney Names: Nicholas C. Brown (ASK LLP)
Kara E. Casteel (ASK LLP)

Attorneys' Phone: (651) 406-9665

Nature of Proceeding: Hearing addressing

Debtors' Objection to Claim No. 14 of Bobs

Limited) [Docket No. 850].

# **EXHIBIT LIST**

Exhibit	<u>Description</u>	Offered	Objection	Admitted/	Disposition
<u>#</u>				Not Admitted	
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1.	Master Agreement between				
	Compute North LLC and				
	Bobs Limited				
2.	Order Form for 300 Minerva				
	100TH miners				
3.	Equipment Purchase				
	Agreement between				
	Compute North LLC and				
	True North Data Solutions				
	(U.S.), Inc.				
4.	Compute North LLC				
	Accounts Payable Bills				
5.	Invoice from True North				
6.	BMO Bank register detail				
	D 1				
7.	Bank statements				
8.	June 2021 email chain				
9.	August 2021 Merchant letter				
10.	November 4, 2021 email				
	chain				
11.	November 17, 2021 email				
	chain				
12.	December 13, 2021 email				
	chain				
13.	December 29, 2021 email				
	chain				
14.	Transcript of Peter Allard				
	deposition				
15.	Any document necessary to				
	rebut evidence or testimony				
	by an opposing witness.				
16.	Any exhibit appearing on				
	another party's exhibit list				

The Plan Administrator reserves the right (i) to amend and/or supplement this Witness and Exhibit List at any time prior to the hearing, and (ii) to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate. Notably, the Plan Administrator anticipates that Bobs Limited's discovery responses, which are due on September 8, 2023 and have not been produced as of the filing of this Witness and Exhibit List, will result in additional exhibits. The Plan Administrator also reserves the right to rely upon and use as evidence (i) exhibits included on the exhibit lists of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: September 7, 2023 Respectfully submitted,

#### **ASK LLP**

By: /s/ Nicholas C. Brown

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292 Kara E. Casteel, Esq., MN SBN 0389115 (admitted *pro hac vice*) Nicholas C. Brown, Esq., NC SBN 38054 (admitted *pro hac vice*) 2600 Eagan Woods Drive, Suite 400 St. Paul, MN 55121 Telephone: (651) 289-3846 Fax: (651) 406-9676

Email: jsteinfeld@askllp.com kcasteel@askllp.com nbrown@askllp.com Counsel to the Liquidating Trustee

## **Certificate of Service**

I certify that on September 7, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and further that a copy of the foregoing document was sent by first class mail and electronic mail to counsel for Bobs Limited, as follows:

Steven Leyh, Esq. Hoover Slovacek, LLP Galleria Tower II 5051 Westheimer, Suite 1200 Houston, TX 77056 leyh@hooverslovacek.com

/s/ Nicholas C. Brown

Nicholas C. Brown